

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KNACK SYSTEMS, LLC)	
)	
Plaintiff/Counter-defendant,)	
)	
v.)	
)	Case No. 3:21-cv-07919
TECH DENALI, LLC)	
)	
Defendant/Counter-plaintiff.)	

Via CM/ECF

Honorable Jessica S. Allen, U.S.M.J.
District of New Jersey
Martin Luther King Building and U.S. Courthouse
Courtroom 2B
50 Walnut Street
Newark, New Jersey 07102

April 17, 2023

Re: Knack Systems, LLC v. TechDenali, LLC
Dkt. No. 21-cv-79219
Joint Letter Regarding Fact Discovery Pursuant to March 2, 2023 Letter Order

Dear Judge Allen:

Counsel for plaintiff Knack Systems, LLC (“Plaintiff”) and Tech Denali, LLC (“Defendant”) write pursuant to the Court’s March 2, 2023, letter order (ECF No. 54) directing the parties to submit a joint status letter addressing the status of the parties’ completion of fact discovery.

The parties recently completed party depositions of a Rule 30(b)(6) representative from Plaintiff on April 11, and a Rule 30(b)(6) representative from Defendant on April 13. The parties do not contemplate further fact depositions at this time, but have yet to receive or otherwise complete their review of the transcripts of the recent party depositions in order to ascertain whether the testimony elicited therein gives rise to factual discovery issues. To the extent factual discovery issues arose during these depositions, the parties will attempt to meet and confer in order to resolve those issues before bringing them to the Court’s attention.

Accordingly, the parties do not request modifications to the existing discovery deadlines at this time, but will notify the Court promptly should the need to revisit any fact discovery issues arise. We look forward to the parties' upcoming telephonic status conference with the Court, currently scheduled for May 16, 2023. Thank you for your Honor's attention to this matter.

Respectfully submitted,

By: /s/ Matthew I. W. Baker

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